REMARKS

I. Status Summary

Claims 1-28, 30-35, and 37-49 are pending in the present application. Claims 1-28, 30-35, and 37-49 presently stand rejected. By this amendment, claims 1, 23, 30, 37, and 46-49 have been amended and claim 6 has been canceled. Therefore, upon entry of this amendment, claims 1-5, 7-28, 30-35, and 37-49 will be pending in the subject patent application.

II. Claim Rejections – 35 U.S.C. § 103

Claims 1-15, 20, 21, 23-28, 37-39, 41, 43, 44, and 46-49 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Number 5,036,984 to Labarthe in view of U.S. Patent No. 6,168,080 to Verschuur.

Claims 16-18 and 39-41 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe and Verschuur in view of U.S. Patent No. 6,073,060 to Robinson.

Claims 19, 22, 42, and 45 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe and Verschuur in view of U.S. Patent No. 4,858,907 to Eisener et al.

Claims 30-35 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe and Verschuur in view of U.S. Patent Application Serial No. 2001/0032881 to Wells et al.

Applicant has carefully studied the Examiner's comments and contentions set forth in the Official Action and respectfully submits that the presently claimed subject matter is not rendered obvious by any combination of the cited references. The Examiner's rejections based on 35 U.S.C. § 103(a) are respectfully traversed as discussed below.

A. Labarthe in view of Verschuur

(i) Examiner's Argument

Claims 1-15, 20, 21, 23-28, 37-39, 41, 43, 44, and 46-49 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe in view of Verschuur. The Examiner has maintained the rejections based on Labarthe in view of Verschuur as set forth in the first Official Action and has added the following additional contentions.

With respect to Labarthe, the Examiner states that Labarthe, in Figure 1 and column 8, line 63 to column 9, line 5, teaches ensuring that envelopes are correctly processed to avoid mistakes that would not allow checks to be processed through the clearing organizations based on the indicia located on the check's envelope. The Examiner also contends that Labarthe discloses optical recognition of addresses on the outside of an envelope as well as through the envelope's window (referring to at least column 7, lines 61-67). Moreover, the Examiner states that Labarthe discloses updating payee's address information, essentially disclosing an account that stores payee

address information that can be accessed and checked to ensure that a match exists between the indicia on the envelope and the account on file.

With respect to Verschuur, the Examiner states that Verschuur, in at least column 3, lines 6-29, discloses reading the encoded information contained within an envelope to ensure it is being sent to the proper recipient, as well as identifying the intended recipient to print the proper address onto the exterior of the envelope, therefore indicating a comparison step according to the Examiner. The Examiner also contends that Verschuur discloses a comparison step in at least column 8, lines 19-27. The Examiner therefore reasons that it would be a simple and functionally equivalent step to compare a printed address with a stored address to ensure proper delivery of a mailpiece.

Applicant respectfully traverses the rejections based upon Labarthe and Verschuur as discussed below.

(ii) Response To Examiner's Argument

Labarthe discloses a method for enabling, without first opening the envelope, prioritized processing of envelopes according to indication of clearing organizations of potentially enclosed checks. The method uses a payee address to convey information that encodes indicia of the clearing organization utilized by the drawer's payor bank. The address information is supplied in a manner so that the encoded indicia are readable from the unopened envelope. The envelopes are sorted unopened according to the encoded indicia after being read by an automatic reader such as an optical address reader, bar code

reader, or combination thereof. After reading and sorting, the envelopes can be selectively processed in a manner determined by the encoded indicia of the clearing organization.

Labarthe merely teaches the use of a first optical reader for reading data on the outside of an envelope. As the Examiner acknowledges, Labarthe does not disclose a second reading device for reading data on inserted documents Additionally, Labarthe does not teach or suggest the use of an external data file containing account information for comparison with acquired package data and document data in order to further process the package.

The Examiner states that Labarthe discloses updating payee's address information and therefore essentially discloses an account that stores payee address information that can be accessed and checked to ensure that a match exists between the indicia on the envelope and the account on file. Applicant respectfully submits that this updating of the payee address information is merely for the purpose of verifying the sort order of the checks received according to clearing organization used by a particular payee and is wholly unrelated to comparing acquired package data and document data with account information located in an external data file in order to further process the package.

Verschuur discloses a system for acquiring encoded information from the contents of sealed envelopes or other layered structures that conceal the information from view. Verschuur is directed to outgoing mail that is subject to

sorting and other processing errors that are difficult to detect because once sealed, the contents are concealed from view. Verschuur accomplishes this information acquisition by means of a transducer that measures changes in capacitance of a localized region beneath the surface of the envelope, such as can be produced by conductive inks or inks with a dielectric constant different from the paper upon which it is printed. The information obtained by the capacitance measurements can be used to affect further processing of the envelopes or other layered structures, such as comparing the obtained content information with address information optically read from the envelope to verify a match.

The envelope content detector of Verschuur requires the use of a transducer or parallel plate capacitors that are connected to an amplifier whose output is then examined by a computer. Document information within the envelope is printed using either conductive ink or dielectric ink using conventional bar-code or other conventional symbols that are interpretable in alphanumeric characters, and when either ink passes between the plates of the transducer, the capacitance changes. The transducer of Verschuur is directed solely to detection of conductive or dielectric ink that may be present on one or more documents inserted into an envelope. There is no teaching or suggestion of optical reading by the detector of Verschuur that detects the envelope content information and therefore alphanumeric information, such as

addresses, account numbers, and the like, cannot be read directly from the document inserts.

Additionally, Verschuur makes a direct comparison between information obtained from the envelope and information obtained from the contents (such as an address - address comparison) to verify if they match and to discontinue processing of the envelopes upon detection of a mismatch (see column 3, lines 19-29 and column 8, lines 19-26). There is no teaching or suggestion in Verschuur to compare envelope and content data by utilizing a data file containing account information, a portion of which corresponds to the envelope and content data.

The present subject matter is directed to verification of matching associations between information or data printed on a closed face package (package data) and material and/or information contained inside, but viewable through, the closed face package (document data). In order to better clarify and more particularly point out the present subject matter, independent claims 1, 23, 30, 37, and 46-49 have been amended as set forth above and described below.

Independent claim 1 is directed to a method for verifying a correct association between information printed on a closed face package and material and/or information contained within the package. As presently amended, the data file provided includes account information stored therein corresponding to printed package data on the package and printed document data on the inserted document. Additionally, the first reading device of the present subject

matter has been clarified as designed to optically read the printed package data on the package. Claim 1 also recites that the second reading device optically reads printed document data on the inserted document and appearing through a window in the package. These first and second readers therefore utilize optical reading of the package and inserted document and are designed for reading of the package and document data themselves and not for merely detecting the presence of or number of inserted documents. Amended claim 1 further recites reading of the data file to access the account information stored therein and comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data. Therefore, rather than the package data and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the document data is utilized and the account information is compared with both the package data and the document data to determine whether a matching association exists between the package data and the document data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 1. Specifically, Labarthe and Verschuur fail to teach or suggest first and second reading devices that optically read printed package and document data on the package

and inserted document. Additionally, Labarthe and Verschuur fail to teach or suggest providing a data file to access account information stored therein corresponding to the package data and the document data, reading of the data file to access the account information stored therein, or comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data. Verschuur does mention reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. The comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data and document data in order to determine whether a matching association exists between the package data and document data.

Independent claim 23 is directed to a system for verifying a correct association between information printed on a closed face package and material and/or information contained inside the package. As presented in Amendment A, claim 23 recites that the optical reader is adapted to optically read printed

package data on a closed face package and to optically read printed document data on an inserted document and appearing through a window in the package. This optical reader allows for optical reading of the inserted document and is designed for reading of the document data itself and not for merely detecting the presence of or number of inserted documents. As presently amended, claim 23 further recites a storage medium containing a data file, the data file including account information specific to a mail recipient and corresponding to the package data and the document data. As amended claim 23 further recites, an electronic processing apparatus is adapted to access the data file and retrieve data forming a part of the account information and to compare at least a portion of the data forming a part of the account information with the package data and to compare at least a portion of the data forming a part of the account information with the document data to determine whether a matching association exists between the package data and the document data. Therefore, rather than the package data and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the document data is utilized and the account information is compared with both the package data and the document data to determine whether a matching association exists between the package data and the document data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 23. Specifically,

Labarthe and Verschuur fail to teach or suggest an optical reading device that optically reads printed package data on a closed face package and printed document data on an inserted document. Additionally, Labarthe and Verschuur fail to teach or suggest providing a storage medium containing a data file, the data file including account information specific to a mail recipient and corresponding to the package data and the document data, the accessing of the data file and retrieving data forming a part of the account information, or comparing at least a portion of the data forming a part of the account information with the package data and comparing at least a portion of the data forming a part of the account information with the document data to determine whether a matching association exists between the package data and the document data. As noted above, Verschuur does mention reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. Also, the comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data and document data in order to determine whether a matching association exists between the package data and document data.

Independent claim 30 is directed to a mailpiece processing system. As presented in Amendment A, claim 30 recites that the reader is adapted to optically read printed package data on a closed face package and to optically read printed document data on an inserted document and appearing through a window in the package. This optical reader allows for optical reading of the inserted document and is designed for reading of the document data itself and not for merely detecting the presence of or number of inserted documents. As presently amended, claim 30 further recites a storage medium containing a data file, the data file including account information specific to a mail recipient and corresponding to the package data and the document data. As amended claim 30 further recites, an electronic processing apparatus is adapted to access the data file and retrieve data forming a part of the account information and to compare at least a portion of the data forming a part of the account information with the package data and to compare at least a portion of the data forming a part of the account information with the document data to determine whether a matching association exists between the package data and the document data. Therefore, rather than the package data and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the document data is utilized and the account information is compared with both the package data and the document data to determine whether a matching association exists between the package data and the document data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 30. Specifically, Labarthe and Verschuur fail to teach or suggest an optical reading device that optically reads printed package data on a closed face package and printed document data on an inserted document. Additionally, Labarthe and Verschuur fail to teach or suggest providing a storage medium containing a data file, the data file including account information specific to a mail recipient and corresponding to the package data and the document data, the accessing of the data file and retrieving data forming a part of the account information, or comparing at least a portion of the data forming a part of the account information with the package data and comparing at least a portion of the data forming a part of the account information with the document data to determine whether a matching association exists between the package data and the document data. As noted above, Verschuur does mention reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. Also, the comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data

and document data in order to determine whether a matching association exists between the package data and document data.

Independent claim 37 is directed to a computer program product adapted for verifying a correct association between information printed on a closed face package and material and/or information contained inside the package. As presently amended, the package data and document data are optically read by first and second optical reading devices, respectively. The first and second optical readers allow for optical reading of the package and inserted document and are designed for reading of the package and document data themselves and not for merely detecting the presence of or number of inserted documents. Amended claim 37 of the present subject matter is also directed to reading a data file to access account information stored therein corresponding to the package data and the document data and comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data. Therefore, it is important to note that, rather than the package data and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the document data is utilized and the account information is compared with the package data and the document data to

determine whether a matching association exists between the package data and the document data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 37. Specifically, Labarthe and Verschuur fail to teach or suggest receiving package data and document data, the package data and document data being optically read by first and second reading devices, respectively, off of the package and inserted document, respectively. Additionally, Labarthe and Verschuur fail to teach or suggest reading a data file to access account information stored therein corresponding to the package data and the document data, or comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data. As noted above, Verschuur does mention reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. Moreover, the comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of

account information from that data file to package data and document data in order to determine whether a matching association exists between the package data and document data.

Regarding independent claims 46-49, which correspond essentially to claims 1, 23, 30 and 37, respectively, but all recite "insert material" and "insert data" instead of "material and/or information and document data", respectively, these claims have been amended similar to claims 1, 23, 30 and 37 above and described in more detail hereinbelow.

Independent claim 46 is directed to a method for verifying a correct association between information printed on a closed face package and insert material contained within the package. As presently amended, the data file provided includes account information stored therein corresponding to printed package data on the package and printed insert data on the inserted material. Additionally, the first reading device of the present subject matter has been clarified as designed to optically read the printed package data on the package. Claim 46 also recites that the second reading device optically reads printed insert data on the inserted material and appearing through a window in the package. These first and second readers therefore utilize optical reading of the package and inserted material and are designed for reading of the package and insert data themselves and not for merely detecting the presence of or number of inserted documents. Amended claim 46 further recites reading of the data file to access the account information stored therein and comparing at least a

portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the insert data to determine whether a matching association exists between the package data and the insert data. Therefore, rather than the package data and insert data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the insert data is utilized and the account information is compared with both the package data and the insert data to determine whether a matching association exists between the package data and the insert data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 46. Specifically, Labarthe and Verschuur fail to teach or suggest first and second reading devices that optically read printed package and insert data on the package and inserted material. Additionally, Labarthe and Verschuur fail to teach or suggest providing a data file to access account information stored therein corresponding to the package data and the insert data, reading of the data file to access the account information stored therein, or comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the insert data to determine whether a matching association exists between the package data and the insert data. Verschuur does discuss reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with

identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. The comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data and insert data in order to determine whether a matching association exists between the package data and insert data.

Independent claim 47 is directed to a system for verifying a correct association between information printed on a closed face package and insert material contained inside the package. As presented in Amendment A, claim 23 recites that the optical reader is adapted to optically read printed package data on a closed face package and to optically read printed insert data on inserted material and appearing through a window in the package. This optical reader allows for optical reading of the inserted material and is designed for reading of the insert data itself and not for merely detecting the presence of or number of inserted documents. As presently amended, claim 47 further recites a storage medium containing a data file, the data file including account information specific to a mail recipient and corresponding to the package data and the insert data. As amended claim 47 further recites, an electronic processing apparatus is adapted to access the data file and retrieve data

forming a part of the account information and to compare at least a portion of the data forming a part of the account information with the package data and to compare at least a portion of the data forming a part of the account information with the insert data to determine whether a matching association exists between the package data and the insert data. Therefore, rather than the package data and insert data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the insert data is utilized and the account information is compared with both the package data and the insert data to determine whether a matching association exists between the package data and the insert data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 47. Specifically, Labarthe and Verschuur fail to teach or suggest an optical reading device that optically reads printed package data on a closed face package and printed insert data on inserted material. Additionally, Labarthe and Verschuur fail to teach or suggest providing a storage medium containing a data file, the data file including account information specific to a mail recipient and corresponding to the package data and the insert data, the accessing of the data file and retrieving data forming a part of the account information, or comparing at least a portion of the data forming a part of the account information with the package data and comparing at least a portion of the data forming a part of the account information with the insert data to determine whether a matching association

exists between the package data and the insert data. As noted above, Verschuur does discuss reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. Also, the comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data and insert data in order to determine whether a matching association exists between the package data and insert data.

Independent claim 48 is directed to a mailpiece processing system. Claim 48 recites that the reader is adapted to optically read printed package data on a closed face package and to optically read printed insert data on inserted material and appearing through a window in the package. This optical reader allows for optical reading of the inserted material and is designed for reading of the insert data itself and not for merely detecting the presence of or number of inserted documents. As presently amended, claim 48 further recites a storage medium containing a data file, the data file including account information specific to a mail recipient and corresponding to the package data and the insert data. As amended claim 48 further recites, an electronic

processing apparatus is adapted to access the data file and retrieve data forming a part of the account information and to compare at least a portion of the data forming a part of the account information with the package data and to compare at least a portion of the data forming a part of the account information with the insert data to determine whether a matching association exists between the package data and the insert data. Therefore, rather than the package data and insert data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the insert data is utilized and the account information is compared with both the package data and the insert data to determine whether a matching association exists between the package data and the insert data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 48. Specifically, Labarthe and Verschuur fail to teach or suggest an optical reading device that optically reads printed package data on a closed face package and printed insert data on inserted material. Additionally, Labarthe and Verschuur fail to teach or suggest providing a storage medium containing a data file, the data file including account information specific to a mail recipient and corresponding to the package data and the insert data, the accessing of the data file and retrieving data forming a part of the account information, or comparing at least a portion of the data forming a part of the account information with the package data and comparing at least a portion of the data forming a part of the account

information with the insert data to determine whether a matching association exists between the package data and the insert data. As noted above, Verschuur does discuss reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. Also, the comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data and insert data in order to determine whether a matching association exists between the package data and insert data.

Finally, independent claim 49 is directed to a computer program product adapted for verifying a correct association between information printed on a closed face package and insert material contained inside the package. As presently amended, the package data and insert data are optically read by first and second optical reading devices, respectively. The first and second optical readers allow for optical reading of the package and inserted material and are designed for reading of the package and insert data themselves and not for merely detecting the presence of or number of inserted documents. Amended claim 49 of the present subject matter is also directed to reading a data file to

access account information stored therein corresponding to the package data and the insert data and comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the insert data to determine whether a matching association exists between the package data and the insert data. Therefore, it is important to note that, rather than the package data and insert data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the insert data is utilized and the account information is compared with the package data and the insert data to determine whether a matching association exists between the package data and the insert data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 49. Specifically, Labarthe and Verschuur fail to teach or suggest receiving package data and insert data, the package data and insert data being optically read by first and second reading devices, respectively, off of the package and inserted material, respectively. Additionally, Labarthe and Verschuur fail to teach or suggest reading a data file to access account information stored therein corresponding to the package data and the insert data, or comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the insert data to determine whether a matching association exists between the package data and the insert

data. As noted above, Verschuur does discuss reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. Moreover, the comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data and insert data in order to determine whether a matching association exists between the package data and insert data.

(iii) Summary

Labarthe combined with Verschuur fail to teach or suggest the use of reading devices for optically reading printed package data on a package and printed document data on an inserted document within the package, reading a data file to access account information stored therein corresponding to the package data and the document data, or comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to verify a matching association between the package data and the document data. Applicant respectfully submits therefore that Labarthe and Verschuur, either in

combination or alone, fail to render obvious claims 1-15, 20, 21, 23-28, 37-39, 41, 43, 44, and 46-49.

B. Labarthe and Verschuur in view of Robinson

Claims 16-18 and 39-41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe/Verschuur in view of Robinson. The Examiner has maintained the rejections based on Labarthe/Verschuur in view of Robinson as set forth in the first Official Action.

Applicant notes that Robinson merely teaches a manually operated mail sorting station for sorting pieces of unsorted mail into numerous bins in a case for holding sorted mail. The sorting station includes a scanner that reads an address printed on the pieces of unsorted mail and communicates through an interface to a computer that stores the address in memory. The sorter includes detectors attached to non-matching bins that may send back an error signal over the connection between the case and the computer in the event they sense that the unsorted mail has been placed in a non-matching bin, wherein the error signal may sound an alarm, display an error message, or the like.

The manual mail sorting station disclosed in Robinson is designed solely for use with manual sorting of rejected letters to assigned delivery mapping schemes (delivery bins) and is not related to indirectly verifying that the enclosed contents of a mailpiece or other enclosure correctly match the printed address or other information on the mailpiece. Additionally and as discussed

above, Labarthe and Verschuur fail to teach or suggest a number of features of the presently claimed subject matter. The addition of Robinson fails to overcome the significant shortcomings of Labarthe combined with Verschuur described above. Applicant respectfully submits therefore that no combination of Labarthe and Verschuur, even in combination with the prior art manual mail sorting station taught by Robinson, renders obvious claims 16-18 and 39-41.

C. Labarthe and Verschuur in view of Eisener et al.

Claims 19, 22, 42, and 45 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe/Verschuur in view of Eisener et al. The Examiner has maintained the rejections based on Labarthe/Verschuur in view of Eisener et al. as set forth in the first Official Action.

Eisener et al. teach an envelope feeding assembly for feeding of and printing on envelopes while the envelopes are in motion. This envelope feeding and printing assembly consists of a system as known in the prior envelope feeding art and has all of the disadvantages associated with prior envelope feeding systems wherein the enclosed contents of the envelope cannot be correctly verified with the printed address or other information on the outside of the envelope. Additionally and as discussed above, Labarthe and Verschuur fail to teach or suggest a number of features of the presently claimed subject matter. The addition of Eisener et al. fails to overcome the significant shortcomings of Labarthe combined with Verschuur described above. Applicant

respectfully submits therefore that no combination of Labarthe and Verschuur, even in combination with the prior art envelope feeding and printing assembly taught by Eisener et al., renders obvious claims 19, 22, 42, and 45.

D. Labarthe and Verschuur in view of Wells et al.

Claims 30-35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe/Verschuur in view of Wells et al. The Examiner has maintained the rejections based on Labarthe/Verschuur in view of Wells et al. as set forth in the first Official Action.

Wells et al. teach an automated electronic verification system operative at the point of creation of a mail piece to enhance customer tracking of mail pieces and other data exchange functions between the Postal service, mass mailers and their customers. Wells et al. is directed to verification of address information and postage value in order to enhance the revenue protection of the postal service and does not address the problems associated with prior art inserters and verifiers wherein the enclosed contents of an envelope cannot be correctly verified with the printed address or other information on the outside of the envelope. Additionally and as discussed above, Labarthe and Verschuur fail to teach or suggest a number of features of the presently claimed subject matter. The addition of Wells et al. fails to overcome the significant shortcomings of Labarthe combined with Verschuur described above. Applicant respectfully submits therefore that no combination of Labarthe and Verschuur,

even in combination with the prior art postage value verifier taught by Wells et al., renders obvious claims 30-35.

E. Summary

In light of the above amendments and remarks, applicant respectfully submits that the cited references, either alone or in combination, fail to render obvious claims 1-28, 30-35, and 37-49, and applicant submits that the rejection of these claims under 35 U.S.C. § 103(a) should be withdrawn and that the claims should be deemed allowable at this time.

CONCLUSION

In light of the above amendments and remarks, it is respectfully submitted that the present application is now in proper condition for allowance, and an early notice to such effect is earnestly solicited.

If any small matter should remain outstanding after the Patent Examiner has had an opportunity to review the above amendments and remarks, the Patent Examiner is respectfully requested to telephone the undersigned patent attorney in order to resolve these matters and avoid the issuance of another Official Action.

DEPOSIT ACCOUNT

The Commissioner is hereby authorized to charge any fees associated with the filing of this correspondence to Deposit Account No. **50-0426**.

Respectfully submitted,

JENKINS, WILSON & TAYLOR, P.A.

Date: January 21, 2005 By: _____

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JLW/EEM/alb